

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
ST. JOSEPH DIVISION**

**In Re:** )  
**Lori Beth Pigg,** )      **Case No.: 14-50266-can-7**  
                **Debtor.** )

**RESPONSE TO UNITED STATES TRUSTEE'S  
MOTION FOR DISGORGELEMENT AND SANCTIONS**

**COMES NOW** Michael McCrary, Esq., and for his Response herein states and avers as follows:

1.     Respondent hereby admits all allegations as contained in paragraph one of Movant's Motion.
2.     Respondent hereby admits all allegations as contained in paragraph two of Movant's Motion.
3.     Neither Respondent nor Debtor contest any exercise of jurisdiction in this matter and both Respondent and Debtor consent to the entry of a final order and judgment in this matter by the Bankruptcy Court.
4.     Respondent hereby admits all allegations as contained in paragraph four of Movant's Motion.
5.     Respondent hereby admits all allegations as contained in paragraph five of Movant's Motion.
6.     Respondent hereby admits all allegations as contained in paragraph six of

Movant's Motion.

7. Respondent hereby admits all allegations as contained in paragraph seven of Movant's Motion.

8. Respondent hereby admits all allegations as contained in paragraph eight of Movant's Motion.

9. Respondent hereby admits all allegations as contained in paragraph nine of Movant's Motion.

10. Respondent hereby admits all allegations as contained in paragraph ten of Movant's Motion.

11. Respondent hereby admits the date of filing but denies all other allegations as contained in paragraph eleven of Movant's Motion.

12. Respondent hereby admits all allegations as contained in paragraph twelve of Movant's Motion.

13. Respondent hereby admits all allegations as contained in paragraph thirteen of Movant's Motion.

14. Respondent hereby admits all allegations as contained in paragraph fourteen of Movant's Motion.

15. Respondent hereby admits all allegations as contained in paragraph fifteen of Movant's Motion.

16. Respondent hereby admits all allegations as contained in paragraph sixteen of Movant's Motion.

17. Respondent hereby admits all allegations as contained in paragraph seventeen of Movant's Motion.
18. Respondent hereby admits all allegations as contained in paragraph eighteen of Movant's Motion.
19. Respondent hereby admits all allegations as contained in paragraph nineteen of Movant's Motion.
20. Respondent is without knowledge as to all allegations as contained in paragraph twenty of Movant's Motion, and therefore denies same.
21. Respondent hereby admits all allegations as contained in paragraph twenty-one of Movant's Motion.
22. Respondent hereby admits all allegations as contained in paragraph twenty-two of Movant's Motion.
23. Respondent hereby admits all allegations as contained in paragraph twenty-three of Movant's Motion.
24. No response is required as to paragraph twenty-four of Movant's Motion.
25. Respondent hereby admits all allegations as contained in paragraph twenty-five of Movant's Motion.
26. Respondent hereby admits all allegations as contained in paragraph twenty-six of Movant's Motion.
27. Respondent hereby admits all allegations as contained in paragraph twenty-seven of Movant's Motion.

28. Respondent hereby admits all allegations as contained in paragraph twenty-eight of Movant's Motion.
29. Respondent hereby admits all allegations as contained in paragraph twenty-nine of Movant's Motion.
30. Respondent hereby admits all allegations as contained in paragraph thirty of Movant's Motion.
31. Respondent hereby admits all allegations as contained in paragraph thirty-one of Movant's Motion.
32. Respondent hereby admits all allegations as contained in paragraph thirty-two of Movant's Motion.
33. Respondent hereby admits all allegations as contained in paragraph thirty-three of Movant's Motion.
34. Respondent hereby admits all allegations as contained in paragraph thirty-four of Movant's Motion.
35. No response is required as to paragraph thirty-five of Movant's Motion.
36. Respondent hereby denies all allegations not specifically admitted to hereinabove as contained in Movant's Motion.
37. In the interests of efficiency, Respondent will not contest the Movant's prayer that the undersigned Respondent pay a sanction of One-Thousand, Five-Hundred Dollars (\$1,500.00), made payable to the Chapter 7 Trustee in this case.

**WHEREFORE**, Respondent prays this honorable Court enter an Order granting Movant's prayers for disgorgement and sanction.

Respectfully Submitted,

/s/ Michael W. McCrary, Esq.  
Michael W. McCrary #52878  
KESPOHL, MCCRARY, & CORNEJO, L.L.C.  
1103 East Walnut Street  
Columbia, MO 65201  
(573) 443-2889  
(573) 443-3889 - FAX  
Respondent

**Certificate of Service**

The undersigned attorney certifies that a true and accurate copy of this instrument was served upon all parties receiving electronic notification and by mailing a copy thereof via first-class mail, postage prepaid, to Debtor:

Lori Beth Pigg  
22477 266<sup>th</sup> Road  
Unionville, MO 63565

on this the 13th day of May, 2015.

/s/ Michael W. McCrary